



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LTG/CMM/RAT  
F. #2015R02148

*610 Federal Plaza  
Central Islip, New York 11722*

May 13, 2018

VIA ECF

The Honorable Joan M. Azrack  
United States District Judge  
Eastern District of New York  
924 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Edward Mangano, et al.  
Criminal Docket No. 16-540 (S-1) (JMA)

Dear Judge Azrack:

The government writes to respectfully request that the summations in the above-reference matter commence Tuesday morning for the reasons set forth below.

First, late last night, the government discovered an issue with the Court's charge as it relates to the false statements charges against Linda Mangano, and alerted chambers and Mr. Carman immediately. This issue will likely be resolved on consent, however, as it stands now, the issue is not resolved.

Moreover, the parties still have not had a chance to review the Court's proposed securities charge, which we wish to incorporate in the initial summation as part of a PowerPoint presentation.

Finally, no proposed verdict sheet has been distributed and there may be some issue in that regard that need to be discussed prior to summations. I note defendants E. Mangano and Venditto object to this request.

Thank you for your consideration.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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cc: Counsel for all Defendants (via email)